

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**JANE DOE 1, et al.,**

**Plaintiffs,**

**v.**

**BAYLOR UNIVERSITY,**

**Defendant.**

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**Civil Action No. 6:16-CV-00173-RP-AWA**

**Consolidated with  
6:17-CV-228-RP-AWA  
6:17-CV-236-RP-AWA**

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**DEFENDANT BAYLOR UNIVERSITY'S ADVISORY TO THE COURT  
REGARDING PRODUCTION**

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Baylor files this Advisory pursuant to the Court's Orders dated February 20, 2020 and April 1, 2020. Dkt. 803, 819.

On February 20, 2020, this Court ordered Baylor to "produce all undisputed materials to Plaintiffs no later than April 30, 2020 and to certify to this Court when that production is complete." Dkt. 803. On April 1, 2020, this Court entered an Order addressing the remaining disputes regarding ESI search term and custodians. Dkt. 819. Pursuant to that ruling, Baylor was required to search the ESI custodians using the additional search terms and produce any responsive and non-privileged documents generated by those terms. The Court also ordered that Baylor "produce all responsive materials and privilege logs in response to Plaintiffs' 1<sup>st</sup>, 2<sup>nd</sup>, 3<sup>rd</sup>, and 4<sup>th</sup> RFPs consistent with the terms of th[e] Order" by the same date, April 30, 2020. (*Id.*)

The purpose of this Advisory is to inform the Court that Baylor will be producing and logging responsive documents to Plaintiffs by the end of today and will file a certification to the Court regarding that production verifying production has been completed by today's date.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing motion was served upon all counsel of record on April 30, 2020, via the Court's ECF/CMF electronic service system as follows:

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